## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
v.	) ) )	CRIMINAL NO. 11-cr-10286-DPW
CATHERINE GREIG, Defendant.	) ) )	

## ASSENTED-TO MOTION FOR EXTENSION OF AUTOMATIC DISCOVERY DATE UNDER LOCAL RULE 116.1 TO SEPTEMBER 15, 2011

The United States hereby submits this assented-to motion requesting that the Court extend the date for its automatic discovery under L.R. 116.1 to September 15, 2011, which is 28 days following the arraignment in this matter. As grounds for this motion, the United States says that the Defendant was arraigned in this matter on August 18, 2011. On that same date, the Defendant filed her notice of automatic discovery stating that she would not waive automatic discovery, which, pursuant to L.R. 116.1(C)(1), set the automatic discovery date for September 1, 2011. Subsequent to that filing, the undersigned counsel for the United States conferred with counsel for the Defendant about the automatic discovery deadlines, and the parties agreed that the United States would provide the automatic discovery materials 28 days after arraignment, which is the default schedule for automatic discovery absent the filing of a notice of no waiver. The United States needs the additional time to collect and produce the automatic discovery materials, which are voluminous.

WHEREFORE, the United States requests that the Court extend the automatic discovery deadline to September 15, 2011.

Respectfully submitted,

CARMEN M. ORTIZ United States Attorney

By: /s/ Jack W. Pirozzolo
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Dated: August 30, 2011

## **CERTIFICATE OF SERVICE**

I, Jack W. Pirozzolo, hereby certify that on August 30, 2011, I served a copy of the foregoing motion via electronic filing on counsel for the defendant.

/s/ Jack W. Pirozzolo Jack W. Pirozzolo